1 2 3 4	BARRY J. PORTMAN Federal Public Defender ELIZABETH M. FALK Assistant Federal Public Defenders 450 Golden Gate Avenue San Francisco, CA 94102 Telephone: (415) 436-7700		
5	Counsel for Defendant DERA MARIE JONES		
6			
7	IN THE UNITED STATES DISTRICT COURT		
8	FOR THE NORTHERN DISTRICT OF CALIFORNIA		
9			
10			
11	UNITED STATES OF AMERICA,	No. CR 05-254 CRB	
12	Plaintiff,	DECLARATION OF ELIZABETH M. FALK;	
13 14	v.	UNOPPOSED MOTION TO ADJUST BRIEFING	
15	DERA MARIE JONES,) SCHEDULE ON) DEFENDANT'S MOTION	
16	Defendant.) FOR A NEW TRIAL (FRCP) 33)	
17) Hearing Date: April 5, 2006 at 2:15 p.m.	
18		The Honorable Charles R. Breyer	
19		The Honorable Charles R. Dieyer	
20			
21	I, Elizabeth M. Falk, declare as follows:		
22	1. I begin a trial before the Honorable Edward M. Chen today, February 22, 2006.		
23	This trial was moved forward to February 22, 2006 last week, after the Pretrial		
24	Conference;		
25	2. I thus request that the briefing schedule on Defendant's Motion for a New Trial be		
26	continued to the following dates, which will not affect the motion hearing date;		
27			
28	\\		
	Jones CR-05-254 CRB - Continue Briefing Schedule		

Opening Motion Due: February 27, 2006. 1 2 **Response Due:** March 22, 2006. **Reply Due:** 3 March 29, 2006. **Motion Hearing:** 4 April 5, 2006. 5 3. The government does not voice any objection to permitting Ms. Jones from 6 7 filing her opening motion on February 27, 2006; however, they reserve the 8 right generally to oppose the filing of the motion on timing ground. I spoke 9 to Mr. Reese personally and he informed me that while he does not care 10 whether the motion is filed on February 22 or 27, he reserves his right to 11 make objections to the general timing of this motion. 12 I swear under penalty of perjury that the foregoing is true and correct to the best of 13 my knowledge. Signed on this the 22nd day of February, 2006. 14 15 16 February 22, 2006 /S/ DATED: 17 18 ELIZABETH M. FALK Assistant Federal Public Defender 19 20 I hereby attest that I have on file all holographic signatures indicated by a "conformed" signature 21 (/S/) within this efiled document. 22 |PROPOSED| ORDER 23 24 For good cause shown, the briefing schedule for Defendant's Motion to Suppress shall be 25 altered as stated in this stipulation. The hearing date of April 5, 2006 shall remain on calendar. 26 27 February 22, 2006 28 THE HONORA UNITED STATE Judge Charles R. Breyer Jones, CR-05-254 CRB - Continue Briefing Schedule